



**RE: Harvard Pound Hall Modification Request**  
Kimberly Tisa to: Jeff Hamel

06/13/2012 07:12 AM

Jeff-

I have reviewed all information pertaining to this request, including the June 7, 2012 Modification Letter; and June 12, 2012 e-mail clarification and response my EPA comments.

All information was submitted in accordance with Condition 14 of the January 26, 2012 EPA Approval. This condition provides for a modification to your cleanup plan in accordance with the procedural requirements under 761.61(a)(3)(ii).

Based on the information, the proposed modification is consistent with the requirements and standards for management and disposal of the identified wastes under 761.61(a) and (c) and 761.79(h). Two walls will be left in-place following removal of the paint as these walls are needed to support existing and proposed underground utilities and above grade landscape areas. These walls will be "filled in" with clean material and a plaza constructed at ground surface.

The modification can thus be implemented as described with the following conditions:

- For documenting PCB concentration in the walls to remain in place, it is estimated that the northern wall is 35-feet long and the western wall is 25 feet long. As such, a minimum of 4 samples from the northern wall and 3 samples from the western wall shall be collected following paint abatement to document the concentrations of PCBs that will remain at the site.
- If PCB concentrations > 1 ppm will remain, a deed notice on this area shall be recorded and submitted to EPA in accordance with 761.61(a)(8) and the conditions of the Approval.
- If PCB concentrations in the remaining walls are determined to be > 25 ppm, Harvard shall contact EPA prior to backfilling to discuss if any additional measures are necessary to support leaving the PCBs in-place.

Should you have any questions regarding the above, please feel free to contact me.

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"Jeff Hamel"

Hi Kim, As a follow-up and based on our discus...

06/12/2012 03:39:50 PM

From: "Jeff Hamel" <jhamel@woodardcurran.com>  
To: Kimberly Tisa/R1/USEPA/US@EPA  
Date: 06/12/2012 03:39 PM  
Subject: RE: Harvard Pound Hall Modification Request

Hi Kim,